

POLICY AREA: DEFINING CRITICAL RAW MATERIALS

1. The authors of the report have used a very interesting holistic and pragmatic approach to the issue of criticality in respect of raw materials at the EU level. A relatively large number of raw materials have been considered in a relatively short period of time. The medium-term horizon (10 years) and the main aggregated indicators (economic importance, supply risk and environmental risk) have been appropriately selected. A plus of the approach is that both primary and secondary raw materials have been analysed in light of their supply risk, substitutability, recycling rates and the impact of emerging technologies has on the demand/production side with time.
2. In our opinion attention could be given to gold. Considering its importance for the green and emerging technologies that lead to an expected increase in demand and the fact that its production might be affected by changing European legislation, it can become critical at some point in time.
3. The recommendations can be appreciated as being reasonable and realistic. Two types of recommendations have been developed: follow-up and support recommendations, as well as policy-oriented recommendations. It is useful to update the study every five years, thus allowing the time factor to be considered. The economic importance will certainly change with time, as societal needs will vary. Hopefully improvements in the legislative and regulatory framework will have a positive impact on the supply from EU internal sources. It is expected that an enlargement in scope will be beneficial for improving policy-making.
4. There is not any study on assessing the criticality of raw materials at the national level. Considering the industrial importance and use of the defined critical materials, as well as the current geological knowledge, it is appreciated that in Romania there are favorable conditions for prospecting and exploring for rare earth, tungsten, graphite, magnesium, niobium, antimony and beryllium. Also, former tailings ponds and waste dumps from old mining works that main contain various grades of critical elements can be explored in light of their becoming economic due to improvements brought about by the new processing technologies.
5. Further search in the functionality of the raw materials market could be envisaged in an update of the study.
6. Creation of a supply stock of raw materials needs further consideration on the benefits that such a system could really have, as well as on the impacts it may have. As further assessment is necessary in order to take any decision it is premature to give a firm answer on the appropriateness of such a system.

POLICY AREA: TRADE

7. The importance of the commerce is well reflected and balanced in the RMI activities. The emergency of the need to take short-terms actions for lowering the supply risk for critical raw materials from some geographical areas is acknowledged and should be achieved in

parallel with the efforts necessary to be made in relation with the other pillars of the RMI, notably measures for supply from the domestic market, recycling, R&D.

8. It is appreciated that the main conclusions of the trade report are relevant for the current status in this policy area.
9. It is essential that the international markets operate in a free and transparent way. Measures of distortive nature should be identified and challenged by using the existing mechanisms and instruments.
10. We are not aware of any specific actions in the field of Raw materials diplomacy.

POLICY AREA: DEVELOPMENT

11. A diversified mix of specific actions should be envisaged in the frame of the development policy to promote sustainable access to raw materials from developing countries. The needs and expectations of the developing countries need to be assessed and properly addressed by the EU initiatives in a holistic approach. The EU support may be viewed as an umbrella, but also mechanism to provide funding should be created. The priority is to assess the potential and to promote it by investments, including by providing support for carrying out exploration and mining projects by the European companies. The projects will promote sound use of the European knowledge, technology and environmental and social standards. It is advisable to use all the existing and traditional channels between the EU countries and the developing ones to strengthen cooperation in the field of development. Another way is to participate in international initiatives and promote cooperation in the frame of existing fora, such as the Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development.. Relevant actions may include improving good governance in the field of natural resources management. An important aspect is the improvement of the geological knowledge base which can be achieved by including specific themes under the research framework programmes financed at the EU level, but also by supporting cooperation between the member states and the developing countries with regard to capacity building, including by encouraging twinning of institutions. Creation of sound information systems should also be promoted.
12. The issue of Revenue Transparency is one of the most important issues in the effort to create a sound investment climate, as it lowers the scope for corruption. The mining projects should provide benefits for the resource-rich countries and should contribute to the sustainable development. As regards the participation in the Extractive Industry Transparency Initiative (EITI) it is important to coordinate between the member states and assess if there is any benefit and what are the implications in the wider context of the EU policy and existing legislation in the field of transparency.
13. With regard to activities under the frame of the Agreement between the EU and the African Union specific activities should be envisaged in order to improve good governance and make better use of the European knowledge transfer, but equally important will be to support ways for an investment programme.

14. The range of raw materials envisaged under the development policy could be theoretically enlarged. However, careful assessment should be carried out in order to ensure the final objective of the RMI , namely the increasing the competitiveness of the European industry and raw materials highly contributing to its achievement to benefit from most attention.
15. There is no such initiative underway. However, projects in the field of exploration and mining extraction were carried out in the past on bilateral cooperation basis with African countries and other developing countries. Promotion of such initiatives should be pursued at EU level, as well as support for cooperation between EU countries and developing countries.

POLICY AREA: IMPROVEMENT OF THE REGULATORY FRAMEWORK CONDITIONS INSIDE THE EU

16. The themes identified by the ad-hoc group of experts correspond to the major challenges in the policy area. In order to facilitate the sustainable supply of raw materials from EU deposits it is important to create an appropriate regulatory framework. Access to the land needed for extraction activities, streamlining/accelerating permitting procedures, as well as improving the geological knowledge are essential.
17. We believe that the information provided in the report ensures an appropriate exchange of information on best practices and can constitute a valuable source of knowledge for the member states in the field of minerals policy. It highlights the importance of the sector and provides valuable guidance and case studies/ examples.
18. The recommendations are appropriate.
19. The cooperation between the national bodies with responsibilities in the geological domain should be strengthened. The key is to share information and know-how. The geological conditions vary across Europe and a specific approach may be needed requiring local knowledge and experience. The first step is to strengthen cooperation and assess the results thus obtained and only after that the establishment of a new centralized body at the EU might be considered.
20. The main emphasis should remain on mining. Having in mind that there has been a lack of coordinated policies that affect this sector, the recommendations made in the report are meant to fill a gap.

POLICY AREA: PROMOTING SKILLS AND RESEARCH, DEVELOPMENT AND INNOVATION

21. A better and tighter cooperation between the industry, public authorities and the academic media is vital to promote building skills in the extractive sector. The goal could be achieved by creating partnerships to promote competencies, but also to achieve practical results in the fields of exploration and mining.

22. There are a number of on-going exploration programmes carried out by private investors on the basis of exploration licences issued under the Mining law, notably in the sector of mineral ores and industrial minerals. It is expected that by deploying new methods and technologies new and important discoveries be made. Also, we are in process of filling some gaps linked with the creation of a proper information system, involving appropriate organization of archives, newly acquired data, maps and databases using the frame of the INSPIRE directive.
23. Actions relating to the creation of a European resource database should receive proper attention.
24. An important action in the field of research and innovation with a positive impact on the security of supply of raw materials for the EU industry relate to the re-assessment of the mineral potential of the European countries, using advanced modeling, new concepts in relation with ore formation and reinterpretation and integration of previous data. This may include providing proper financial instruments to be used by the relevant national authorities, facilitating investment in exploration by private companies and supporting creating effective public-private partnerships.
25. Innovative technologies in the field of exploration and extraction that should require proper attention relate to better exploration technologies aiming at discovering new deposits, including deeper targets, develop extraction methods in order to allow for full extraction of the deposit, developing extraction and processing methods to efficiently extract low-grade deposits and minerals in old tailing ponds and waste dumps and minimize the environmental impact.
26. Other aspects may be integrated using a careful assessment and a phased approach.

POLICY AREA: RESOURCE EFFICIENCY AND RECYCLING

27. A high potential for an increase in the resource efficiency and recycling rates is to ensure an increase in the collection rate of the end-of-life-cycle vehicles and used electronic equipment. This can be achieved by promoting better awareness campaigns and providing incentives to their owners. Such measures will decrease the export of such items outside the European Union.
28. A possible way to improve the statistics could be introducing a more rigorous control of the registers with the input/output records of recycling flows.
29. This aspect is not properly dealt with, particularly having in view the relatively small price offered by the collectors of paper to be recycled. On the other hand, paper recycling implies organizing closed spaces with low humidity. Awareness activities in this regard may prove a good starting point.